

## **EXHIBIT F**

**From:** [Chavez, Jordan](#)  
**To:** [Jennifer Ayad](#); [George Gerro](#)  
**Cc:** [john@gerrolaw.com](#); [Columbus, Eli](#); [Erickson, Mark](#); [Clark, David](#); [Aulet, Kenneth J.](#); [Axelrod, Tristan G.](#); [Daniel M. Stolz](#); [Susan S. Long](#)  
**Subject:** RE: Gerro v. BlockFi Lending LLC, et al. (Super. Ct. L.A. County Case Nos. 20BBCV00308 and 20STCV31493)  
**Date:** Friday, September 6, 2024 9:50:00 AM  
**Attachments:** [image001.jpg](#)

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Mr. Gerro,

We are in receipt of the requests for dismissal you filed in Case Nos. 20BBCV00308 and 20STCV31493 in the Superior Court of California, County of Los Angeles on August 19, 2024. The requests are incomplete and non-compliant with our August 8, 2024 dismissal demand and the Plan and Confirmation Order for the following reasons:

- The cases must be dismissed with prejudice; you have explicitly requested dismissal without prejudice in both cases.
- You have failed to dismiss all defendants related to BlockFi from both cases. As we stated in our dismissal demand, you are barred from pursuing any claims or causes of action against “(a) the Debtors, (b) the Wind-Down Debtors, (c) the Released Parties... and (g) each Related Party of each Entity in clauses (a) through (f).” A “Related Party” includes, *inter alia*, “current and former directors, managers, officers...employees, and agents.” You name certain “Doe” defendants that you allege are agents and/or employees of BlockFi. All agents and employees of BlockFi are Related Parties. As such, you may not pursue any claims or causes of actions against them as you did not opt out of the third-party release contained in the Plan. Indeed, your refusal to dismiss the California state court cases in their entirety, when your sole remedy remains with the courts of the 3rd Circuit and with no claims at issue in California at all, is quite simply improper.

Please immediately dismiss the California state court actions **in their entirety with prejudice before September 13, 2024**. Failure to do so will result in the filing of a show cause motion with the Bankruptcy Court seeking to enforce the Confirmation Order, which may include a request for sanctions against you and your firm.

Thank you,  
Jordan

**Jordan Chavez** | Associate

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**From:** Jennifer Ayad <[Jennifer@gerrolaw.com](mailto:Jennifer@gerrolaw.com)>

**Sent:** Wednesday, August 21, 2024 4:17 PM

**To:** Chavez, Jordan <[Jordan.Chavez@haynesboone.com](mailto:Jordan.Chavez@haynesboone.com)>

**Cc:** [john@gerrolaw.com](mailto:john@gerrolaw.com); [Columbus, Eli <Eli.Columbus@haynesboone.com>](mailto:Columbus, Eli <Eli.Columbus@haynesboone.com>); [Erickson, Mark <Mark.Erickson@haynesboone.com>](mailto:Erickson, Mark <Mark.Erickson@haynesboone.com>); [Clark, David <David.Clark@haynesboone.com>](mailto:Clark, David <David.Clark@haynesboone.com>); [Aulet, Kenneth J. <KAulet@brownrudnick.com>](mailto:Aulet, Kenneth J. <KAulet@brownrudnick.com>); [Axelrod, Tristan G. <TAxelrod@brownrudnick.com>](mailto:Axelrod, Tristan G. <TAxelrod@brownrudnick.com>); [Daniel M. Stolz <DStolz@genovaburns.com>](mailto:Daniel M. Stolz <DStolz@genovaburns.com>); [Susan S. Long <SLong@genovaburns.com>](mailto:Susan S. Long <SLong@genovaburns.com>); [George Gerro <george@gerrolaw.com>](mailto:George Gerro <george@gerrolaw.com>)

**Subject:** Gerro v. BlockFi Lending LLC, et al. (Super. Ct. L.A. County Case Nos. 20BBCV00308 and 20STCV31493)

**EXTERNAL:** Sent from outside Haynes and Boone, LLP

Greetings counsel:

Please find attached electronic service of conforming copies the following document that have been filed in the above-entitled case:

**REQUEST FOR DISMISSAL IN LOS ANGELES SUPERIOR COURT CASE NO.  
20BBCV00308**

**REQUEST FOR DISMISSAL IN LOS ANGELES SUPERIOR COURT CASE NO.  
20STCV31493**

Thank you.